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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESE DAVID CARILLO CASILLAS (2),  
GABRIELA MENDOZA VAZQUEZ (7),  
JULIO CESAR ROSALES SAUCEDO  
(9),  
BRITTNEY LEE ZARAGOZA (10),  
SALVADOR GUDINO CHAVEZ (11),  
EDGAR OMAR HERERRA FARIAS  
(16),  
ALFREDO MAGANA GARIBAY, aka  
FREDDY (18)  
JUAN BRAVO ZAMBRANO (19),  
MIGUEL REYES GARCIA (21), and  
JOSE ADRIAN MENDOZA (23)

Defendants.

4:15-CR-6049-EFS

Supplement as to the Proposed  
Modus Operandi Expert

Plaintiff, United States of America, by and through Joseph H. Harrington,

1 Acting United States Attorney for the Eastern District of Washington and Stephanie Van  
2 Marter, Assistant United States Attorney for the Eastern District of Washington,  
3 respectfully submits the following Supplement to its Notice of Modus Operandi Experts.  
4

5 **DRUG MODUS OPERANDI EXPERT**

6 In response to counsel's request for additional information as to which proposed  
7 expert is going to offer which testimony, the United States offers this supplement to its  
8 earlier notice of expert.  
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10 The Government expects this expert testimony to encompass various topics about  
11 transnational drug trafficking organizations to include the following:  
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13 **1) *Importance and use of multiple geographic locations:***

14 SA Leahy will provide testimony that it is common for transnational drug  
15 trafficking organizations to utilize various geographic areas within the United States and  
16 Canada. SA Leahy will explain to the jury the basic need to get the product from its  
17 source location, Mexico, to their distribution hubs, much like any successful international  
18 business. SA Leahy will further testify that for organizations operating on the west coast  
19 of the United States, it is common to have a "halfway" location, which is typically in the  
20 Los Angeles CA area or Phoenix AZ area depending on the origination source of the  
21 drugs. The purpose of that halfway point location is to have a safe area to unload the  
22 bulk shipments secreted within vehicles. The bulk shipment is then broken down into  
23 smaller shipments destined for the distribution hubs. This testimony will be offered by  
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1 SA Leahy.

2 SA Leahy will further testify that areas in the Eastern District of Washington  
3 (EDWA) to include Yakima and the Tri-Cities, are distribution hubs for these  
4 organizations. From the distribution hubs, the shipments are broken down again for  
5 particular customers depending on the product. As will be discussed more fully below,  
6 financial profit drives which drugs are distributed where from the distribution hubs.  
7 From the distribution hubs in this district, the common locations that receive the  
8 shipments include North Dakota, Minnesota, Illinois, Idaho, Montana, Vancouver BC  
9 and locally to the Spokane area.  
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13 ***2) Transportation Methods, Quantities and Pricing of Cocaine,***  
14 ***Methamphetamine, Heroin and Fentanyl in the United States and Canada***  
15 ***relative to Transactional Drug Trafficking Organizations***

16 The expert testimony from these witnesses will also include an understanding of  
17 what quantities and kinds of controlled substances are typically trafficked as well as their  
18 frequency of shipment. The United States anticipates the testimony from SA Leahy will  
19 be that the bulk shipments from the source location (Mexico) typically contain upwards  
20 of 50 pounds of mixed product to include methamphetamine, cocaine, heroin and now  
21 Fentanyl. SA Leahy will further testify that those bulk shipments are then broken down  
22 to 10-20 pound shipments at the halfway point locations and transported in various ways  
23 to the distribution hubs. The methods of transportation include vehicles with secreted  
24 compartments and the use of commercial bus lines. Once at the distribution hub, the  
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1 shipments are then prepared for distribution. These shipments typically come from the  
2 source city several times per week.

3 SA Leahy, Sgt. Scott Barlow and Constable Erik Kimura will further testify as to  
4 the importance of the location of sale in the distribution network. As indicated above, the  
5 distribution hubs further break down bulk shipments after they have already gone through  
6 the halfway point cities. Sgt. Scott Barlow and Constable Erik Kimura will explain why  
7 these distribution hubs typically send the product into Vancouver BC area and SA Leahy  
8 will testify as why the product is also sent east as noted above. Specifically Sgt. Scott  
9 Barlow and Constable Erik Kimura will testify that a majority of the cocaine shipped to  
10 the distribution hubs will go north into Canada as a kilogram of cocaine will sell  
11 anywhere from \$55,000 to \$70,000 per kilo (US dollars). SA Leahy will testify that a  
12 majority of the methamphetamine is typically sent east to locations in North Dakota and  
13 Minneapolis because one pound of methamphetamine in those locations can sell  
14 anywhere from \$15,000 to \$20,000 per pound whereas on the west coast, you can only  
15 sell a pound for approximately \$3,500 to \$6000.

16 SA Leahy, Sgt. Scott Barlow and Constable Erik Kimura will also testify as to the  
17 pricing and trafficking pattern of heroin and a new opiate to the drug scene, Fentanyl.

### 23 ***3) Flow of Cash Drug Proceeds***

24 The proposed expert testimony will also address what happens to the cash drug  
25 proceeds in these transitional organizations. Specifically, SA Leahy is expected to  
26

1 testify that like any international business, there is overhead and daily expenses that must  
2 be paid. These overhead expenses include but are not limited to the following: housing  
3 costs at the halfway point and distribution hub locations; vehicle costs to include the costs  
4 associated with building secret compartments or “Clavos”; payments to various workers  
5 in the organization to include transporters who drive the shipments from the source  
6 locations all the way to the distribution cities; and costs associated with lost shipments  
7 that are either robbed or seized by law enforcement.  
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10 SA Leahy will further testify that commonly, the leader/organizers that are located  
11 at the distribution hubs and source locations, will direct the flow of the cash drugs  
12 proceeds. SA Leahy and Sgt. Barlow will testify that the cash drug proceeds are then  
13 disbursed directly into bank accounts via wire transfer or transported back in bulk cash  
14 shipments to the source locations. SA Leahy will also address the importance of having  
15 access to legitimate businesses who can “launder” or wash the drug cash proceeds. It is  
16 only through these front companies that the organizations can utilize bank accounts for  
17 wire transfers. A majority of the wire transfers within the United States’ are directed to  
18 pay the above referenced overhead costs while the majority of the “profits” are sent to the  
19 source location via bulk cash or wire transfer.  
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23 **4) *Various Roles of those involved in the Transnational organization:***  
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25 As referenced above, the proposed expert testimony will further explain the  
26 various roles members of these organizations assume in order for the entire venture to be  
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1 successful. For example, SA Leahy will testify that there are leader/organizers,  
2 distributors, facilitators and transporters:

3 *Leader/organizers* are typically placed at the source locations, halfway points and  
4 distribution hubs. They are typically family members of those in charge at the source city  
5 locations, but not always. As indicated, they typically have a larger breadth of  
6 knowledge as to the larger organization and with that, greater responsibility and control  
7 over the drug shipments and cash flow. They are also responsible for recruiting  
8 transporters, facilitators and distributors.  
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11 *Distributors* are those that are actually selling the product and collecting the cash  
12 that is turned over to the leader/organizer. The expert testimony will include an  
13 understanding of the pressure placed upon distributors and their respective boss  
14 (leader/organizer) as they are responsible for moving a specific amount of product as  
15 dictated by the organization. As a result, they are typically tasked with developing a  
16 customer base in multiple distribution cities.  
17

18  
19 *Facilitators* are utilized to rent houses, cars, open funnel bank accounts and at  
20 times, collect money. The expert testimony will further explain to the jury that they are  
21 typically not directly involved in the drug distribution however, do have some scope of  
22 knowledge as to the distribution activities. The testimony will also be that facilitators are  
23 often from the same geographical area as the distributors and sometimes related to or  
24 involved with the distributors.  
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1       *Transporters*- The expert testimony will explain that these individuals are often  
2 recruited by the distributors and leader/organizers who are tasked with transporting the  
3 drug and money shipments to and from the source cities, halfway points or distribution  
4 hubs. Transporters typically do not have a broad scope of knowledge and are tasked  
5 with not only transporting drug shipments but also drug cash proceeds. They are paid  
6 nominally for their involvement. Often transporters are promoted to distributors once  
7 they have established themselves as trustworthy.  
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10       The basis of the expert opinion sought, is the background and experience of each  
11 witness in investigating transnational drug trafficking organizations. As noted in the  
12 attached Curriculum Vitae's, each of the proposed experts has extensive experience in  
13 investigating these organizations over the last 20 plus years. Aside from extensive  
14 training, this background would include the knowledge gained from the number of  
15 investigations they have participated in, the hundreds of witness and Defendant  
16 interviews of members of these organizations who have detailed the organizations and  
17 their operations. Their basis of knowledge has also been developed through the use of  
18 confidential sources who have infiltrated these organizations and provided reliable and  
19 verified intelligence as to their operations. It also includes the knowledge gained form  
20 working with various law enforcement entities both within and outside the United States.  
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**Conclusion**

The foregoing expert testimony will assist the trier of fact in understanding the evidence and determining material facts in issue. The United States also invites counsel for the Defendants to schedule an appointment wherein they can ask any specific questions of these proposed modus operandi experts.

DATED December 15, 2017.

JOSEPH H. HARRINGTON  
Acting United States Attorney

s/Stephanie Van Marter  
Stephanie Van Marter  
Assistant United States Attorney

**CERTIFICATION**

I hereby certify that on December 15, 2017, I electronically filed the foregoing with the Clerk of the Court and counsel of record using the CM/ECF System.

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